UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)	
MARIE CLAIRE AYOUB)	
Plaintiff,)	15-CV- 13218
V.)	
CITIMORTGAGE, INC.,)	
Defendant.)	
)	

STIPULATION EXTENDING TIME FOR CITIMORTGAGE, INC. TO ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT

The Plaintiff, Marie Claire Ayoub ("Plaintiff"), and the Defendant, CitiMortgage, Inc. ("Citi"), hereby stipulate that Citi shall have up to and including March 25, 2016, to answer or otherwise respond to Plaintiff's complaint. Plaintiff has a pending application for a loan modification that would resolve this dispute. The parties are moving forward in good faith and are discussing settlement but will need more time to allow this process to play out. In the event a foreclosure auction is scheduled, the parties understand that Plaintiff's counsel reserves the right to file a motion for injunction to enjoin the sale.

Respectfully Submitted,

MARIE CLAIRE AYOUB
By her Attorney,

CITIMORTGAGE, INC.

By its Attorney,

/s/ David Zak

David Zak, Esq. (BBO #666431)

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/s/ Amy C. Mariani

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CERTIFICATE OF SERVICE

I hereby certify that this document will be filed today through the ECF system and will be submitted by hand and sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 26, 2016.

/s/ Amy Cashore Mariani
Amy Cashore Mariani